# IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF OHIO EASTERN DIVISION

IN RE: NATIONAL PRESCRIPTION OPIATE LITIGATION

Case No. 17-d-2804

MDL 2804

This document relates to:

Hon. Dan Aaron Polster

Track Three Cases

## Plaintiffs' Submission of Judge's Voir Dire Questions

Plaintiffs hereby submit the following voir dire questions for the Court's review and consideration. Plaintiffs ask that the court ask these questions of the prospective jurors.

#### More Information about the Juror

- Are you from this country?
- Where did you go to high school?
- Do you have post-high school education?

#### **Interactions with Defendants or Issues**

- Do you or someone close to you interact with drug companies?
- Do you or someone close to you work with a retail pharmacy?

## **Feelings about County and Government**

- If you live or have lived in Trumbull or Lake County, how do you feel about county government? How do you feel about the services provided? How do you feel about county officials?
- How would you describe any interaction you have had with your county or its employees or officials?
- In what ways do you rely on county services?
- Do you have any feelings about how the counties spend tax dollars?

#### **Problems with Lawsuits**

- Are you against lawsuits for any reason?
- If you or a family member were injured by someone else's negligence, would you consider a lawsuit?

- Do you think there are too many lawsuits?
- How do you feel about lawyers?
- How do you feel about judges?

### **Open Mind**

• Will you follow my instructions?

### **Covid Questions**

- Have you or anyone close to you ever tested positive for Covid-19?
- Have you been vaccinated for Covid-19?

Respectfully submitted,

Jayne Conroy SIMMONS HANLY CONROY 112 Madison Avenue, 7th Floor New York, NY 10016 (212) 784-6400 (212) 213-5949 (fax) jconroy@simmonsfirm.com

Joseph F. Rice MOTLEY RICE LLC 28 Bridgeside Blvd. Mt. Pleasant, SC 29464 (843) 216-9000 (843) 216-9290 (Fax) jrice@motleyrice.com

Paul T. Farrell, Jr., Esq. FARRELL & FULLER LLC 1311 Ponce de Leone Ave., Suite 202 San Juan, PR 00907 (304)654-8281 paul@farrellfuller.com

Plaintiffs' Co-Lead Counsel

W. Mark Lanier
THE LANIER LAW FIRM
10940 W. Sam Houston Pkwy N., Suite 100
Houston, TX 77064
(713) 659-5200
(713) 659-2204 (Fax)
wml@lanierlawfirm.com

Trial Counsel

/s/Peter H. Weinberger

Peter H. Weinberger (0022076) SPANGENBERG SHIBLEY &LIBER 1001 Lakeside Avenue East, Suite 1700 Cleveland, OH 44114 (216) 696-3232 (216) 696-3924 (Fax) pweinberger@spanglaw.com

Plaintiffs' Liaison Counsel

Frank L. Gallucci
PLEVIN & GALLUCCI CO., L.P.A.
55 Public Square, Suite 222
Cleveland, OH 44113 (216)
861-0804
(216) 861-5322 (Fax)
FGallucci@pglawyer.com

Hunter J. Shkolnik NAPOLI SHKOLNIK 360 Lexington Ave., 11th Floor New York, NY 10017 (212) 397-1000 (646) 843-7603 (Fax) hunter@napolilaw.com

Counsel for Plaintiffs Lake County and Trumbull County, Ohio

# **CERTIFICATE OF SERVICE**

I hereby certify that on this 9th day of August, 2021, the foregoing has been served via CM/ECF to all counsel of record.

s/Peter H. Weinberger
Peter H. Weinberger
Plaintiffs' Liaison Counsel